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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**
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11 ANITA POON,
12 Plaintiff,
13 v.
14 AL JAZEERA AMERICA, LLC; AL
JAZEERA AMERICA HOLDINGS II,
15 LLC; and DOES 1 through 20, inclusive,
16 Defendants.
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CASE NO.

**DECLARATION OF ANAND GUPTA IN
SUPPORT OF DEFENDANT AL JAZEERA
AMERICA, LLC'S REMOVAL OF
ACTION**

**[28 U.S.C. §§ 1332(a) and (b), 1441(b)
and 1446]**

1 I, Anand Gupta, declare and state as follows:

2 1. I currently serve as Senior Vice-President, Finance for Defendant Al Jazeera
3 America, LLC ("AJA"). I make this Declaration in support of AJA's Notice of Removal of Civil
4 Action to the United States District Court for the Northern District of California. I have personal
5 knowledge of the facts set forth in this Declaration, and if called to testify under oath, could and
6 would testify competently thereto.

7 2. AJA is incorporated under the laws of the State of Delaware and has its principal
8 place of business for its operations in the state of New York. AJA's corporate headquarters are
9 located at 435 Hudson Street, 4th Floor, New York, NY 10010.

10 3. A majority of AJA's officers work in AJA's office located in the state of New
11 York. All significant decisions with respect to New York's corporate, financial, executive,
12 administrative and business operations are made in the state of New York.

13 4. AJA is a limited liability company. Al Jazeera America Holdings II, LLC is the
14 sole member of AJA.

15 5. At the time of her termination from AJA, Plaintiff Anita Poon ("Plaintiff") was
16 paid \$132,111.11 in salary for regular and overtime hours worked in the previous twelve (12)
17 months.

18 6. At the time of her termination from AJA, Plaintiff was entitled to 3,000 shares of
19 vested Current TV, LLC stock. The value of those shares is currently \$8.705 per share. To date,
20 Plaintiff has not been paid \$5,484.12 (the "Balance") to which she was entitled, pursuant to
21 AJA's withholding of those shares because of an escrow agreement to which the Balance is
22 subject.


23 I declare under penalty of perjury under the laws of the State of New York and the United
24 States that the foregoing is true and correct.

25 Executed this 13th day of October 2014, at New York, New York.

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Anand Gupta